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## Michael Kamens

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**Windholz, Diane (NYC)** <WindholD@jacksonlewis.com>

Mon, Oct 21, 2013 at 1:05 PM

To: Peter Andrews <pandrews@theharmanfirm.com>

Cc: "Walker G. Harman, Jr." <wharman@theharmanfirm.com>, Lucas Larson <llarson@theharmanfirm.com>,

"Windholz, Diane (NYC)" <WindholD@jacksonlewis.com>, "McCabe, Orla J. (NYC)"

<Orla.McCabe@jacksonlewis.com>, "Mark J. Alonso (malonso@alonsolegal.com)" <malonso@alonsolegal.com>,

"Katherine Jensen (kjensen@alonsolegal.com)" <kjensen@alonsolegal.com>

We can begin Mr. Kamens' deposition at 10 a.m. if that is most convenient for Mr. Kamens. Have you been able to confirm the availability of conference rooms for Mssrs. Orland's and Raju's depositions? If you do not have conference rooms available for those days, you may if you wish use conference rooms in our offices.

Second, with regard to the production of documents, there are thousands of pages of e-mails to and from Mr. Kamens, or on which Mr. Kamens is copied. If you would prefer for us to send you these e-mails electronically, let us know.

With regard to your request for Ms. Duchon's cell phone number, as I already advised you in my September 24<sup>th</sup> e-mail, Ms. Duchon testified that she does not text from her cell phone and does not usually even receive or make calls on her personal cell phone. In fact, Ms. Duchon testified that she has given her cell number to only one account. You then asked whether Sunil Ahuja has Ms. Duchon's telephone number and when she responded that he does and that she also gave Mr. Kamens the number, you stated that "for that reason" you were going to have to request that she disclose the number. I do not believe that this is a sufficient basis for discovery of Ms. Duchon's personal cell phone number. If you disagree, please advise of any authority which would require disclosure of this information.

Diane

**From:** Peter Andrews [mailto:[pandrews@theharmanfirm.com](mailto:pandrews@theharmanfirm.com)]

**Sent:** Friday, October 18, 2013 12:20 PM

**To:** Windholz, Diane (NYC)

**Cc:** Walker G. Harman, Jr.; Lucas Larson

**Subject:** Michael Kamens

[Quoted text hidden]

Representing management exclusively in workplace law and related litigation

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